



June 25, 2025

**VIA ECF / EMAIL**

Hon. Gregory H. Woods  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312  
WoodsNYSDChambers@nysd.uscourts.gov

Re: *Roane v. A&E Television Networks, LLC, et al.*, 1:25-cv-05286-GHW  
Response to Order to Show Cause (ECF No. 17)

Dear Judge Woods:

Pursuant to the Court's June 25, 2025 Order to Show Cause (ECF No. 17), Plaintiff respectfully submits this response to demonstrate that subject matter jurisdiction exists under 28 U.S.C. § 1332.

Plaintiff has now filed an Amended Verified Complaint, which is attached for the Court's reference. The amended complaint cures the jurisdictional deficiency identified in the Court's order by specifically alleging the identities and state citizenships of the members of the Defendant limited liability companies. As alleged, complete diversity exists between Plaintiff, a citizen of Maryland, and all Defendants.

In addition, Plaintiff has retitled and clarified Count I to reflect that the claim arises from Plaintiff's exclusive contractual right to control and approve the commercial use of Haley Gosserand's name, image, and likeness. This clarification does not alter the substance of the claim and remains consistent with the theory previously asserted in Plaintiff's application for a temporary restraining order.

Enclosed for the Court's convenience are:

- (1) a clean copy of the First Amended Verified Complaint; and
- (2) a redline comparison showing changes made from the original pleading.

We respectfully submit that the amended complaint cures the jurisdictional defect and that dismissal is unwarranted.

Respectfully submitted,

  
Dayna C. Cooper  
Counsel for Plaintiff, Charles Roane

cc: All counsel of record (via ECF)

Enclosure: Amended Verified Complaint

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